



RISK ASSESSMENT IN PAPER MILLS

Introduction

The efforts of some paper mills to improve their health and safety performance in response to the PABIAC Initiative and reduce the incidence of injury and ill health has been undermined by weaknesses in the application of risk assessment. This stems in part from the fact that risk assessment is conducted in isolation rather than being viewed as one ingredient, albeit an essential one, of an overall approach in reaching decisions on the management of risks, preferably expressed as a value judgement rather than a number. The effect of this weakness in some mills has been to demoralise management and employees who have often made considerable efforts to participate and make progress, and prevent the introduction of the controls needed to achieve compliance with the law.

Weaknesses Identified

The weaknesses the Sector identified can be summarised as follows:

Integrated approach - Inadequate management arrangements in terms of competency, training, financial resource and demarcation of work, needed to support the risk assessment process, had led to duplication of effort or unproductive effort. Incomplete hazard identification had often arisen because of failure to take an integrated approach and assess risks across the whole system. Instead there had been consideration of hazards in isolation or solely location by location. In other words the 'big picture' was lost.

Targeting - There was insufficient focus on the most serious risks where the hazards were less well controlled. Over complex risk assessment systems made it difficult for mills to prioritise and reach the stage where controls were actually introduced. A 'paralysis by analysis' had developed where the need for additional information was used as an excuse to avoid adopting a decision. Assessment of the risks was sometimes conducted in relation to actual persons rather than hypothetical persons, thereby narrowing the view of the significant risks associated with the hazard.

Standards and best practice - persons trained in the completion of a risk assessment form, but not the standard to be applied when using it conducted many risk assessments. There was an over reliance on willing employees who lacked the knowledge of the relevant standard, instead of involvement. Mills were not identifying what needed to be done in the light of good practice, whether an explicit legal requirement, contained in an Approved Code of Practice, set out in



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a British or European Standard or published industry guidance. This meant that mills were not identifying the risk gap, the difference between 'what is' and 'what should be' for many topics such as slips, trips and falls, machinery safety and manual handling. Mills had not responded to changes in standards or kept best practice under review. Risk assessments often did not contain all of the elements that constitute 'suitable and sufficient' as laid down in the *Approved Code of Practice to the Management of Health and Safety at Work Regulations 1999*¹.

Control measures - Because of the failure described in 2.3 above, mills had not always taken action commensurate to the risks. The full range of options and their relative merits had not been considered. The risk control hierarchy, set out in the Management of Health and Safety at Work Regulations 1999 in Regulation 4 'Principles of prevention to be applied' and reflected in other topic based Regulations was not properly applied and mills relied heavily on controls from the bottom of the hierarchy, such as training, safe systems of work and personal protective equipment rather than elimination or engineering safeguards. In addition, the effect upon actual persons when control measures were applied in practice was not assessed, and adaptation to meet their needs was not carried out.

Residual risk - There were inadequate links to safe systems of work (SSOW) and training needs where residual risks remained. This was particularly important in paper mills where the retrospective introduction of control measures could still leave residual risks that would not be present in new buildings or equipment.

Evaluation - Some paper mills had not evaluated the control measures introduced, including workplace precautions and risk control systems, to make sure that they achieve the desired outcomes and were working in practice, nor had they modified control measures where necessary. Even where control measures had to be modified after introduction, lessons were not learnt for future installations and similar problems were encountered.

Good Practice

Paper mills that have been more successful in implementing risk assessment had the following characteristics:

An integrated approach led by senior management who had ensured adequate arrangements to support the process, including competency, training, resource in terms of finance and people (including their own personal visible support), and who viewed risk assessment as one factor in a wider decision making process about the management of risk. In particular the approach had involved calling on the right competency (whether internal or external) in the right way.



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A **targeted approach** that focused on the most serious risks where the hazards were less well-controlled using risk assessment systems that contained the elements necessary to meet the standard 'suitable and sufficient' and that enabled effective prioritisation of action.

Teams with mixed competencies and knowledge working closely together to ensure that the process was conducted against relevant **standards and best practice**.

A team that analysed all options for **control measures** (ranging from hazard elimination for example using engineering solutions, process redesign and work reorganisation, to control of residual risks with safe systems of work, training and supervision) and selected those appropriate in accordance with the principles for prevention.

A team that identified training needs arising from **residual risk**, and ensured the delivery of training to meet those needs, and that developed, in partnership with many others in the workplace, effective safe systems of work.

A team that made the best of new technology, that was open to apply relevant lessons from other industries as well as their own, and that recognised and embraced the need for continued change and improvement. They had **evaluated** control measures introduced and modified these where necessary, learning lessons along the way.

These mills derived a number of benefits from the risk assessment process, over and above compliance with basic legal standards, including improvements in process efficiency, more consistent training (using illustrated assessments as a training tool), improved inspection and audit due to the common understanding of standards and greater employee involvement contributing to creating a positive working environment.

Action by the Paper and Printing Sector Group

The Sector will continue with programmed national visits to the poorest performing mills. The Sector will continue to support the effort for improvement by paper mills and will collect examples of good practice from better performers and keep inspectors and industry informed of developments.

Benchmark and Action by Paper Mills

Mills are encouraged to follow the PABIAC guidance '*Risk assessment in paper mills*²', which provides advice on many of the issues raised in this Bulletin and make use of the Paper Federation of Great Britain's 'Virtual Mill' and other local forums to exchange best practice. Mills must meet the established standard in



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the Approved Code of Practice and Guidance *'Management of health and safety at work'*.

References

1. L21 *'Management of health and safety at work. Approved Code of Practice and Guidance - Management of Health and Safety at Work Regulations 1999.'*
2. Paper and Board Industry Advisory Committee *'Risk assessment in paper mills'*